

F I S H E R | T A U B E N F E L D L L P

225 Broadway, Suite 1700  
New York, New York 10007  
**Main** 212.571.0700  
**Fax** 212.505.2001  
[www.fishertaubenfeld.com](http://www.fishertaubenfeld.com)

Writer's direct dial: (212) 384-0258  
Writer's email: michael@fishertaubenfeld.com

September 15, 2021

**VIA ECF**

Hon. Alison J. Nathan  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Manjarrez v. Bayard's Ale House LLC et al.  
Case No.: 21-cv-1968 (AJN)

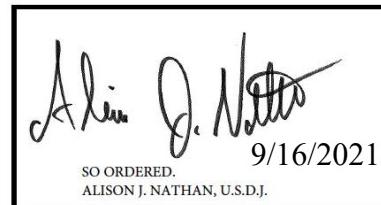
Dear Judge Nathan:

We represent Plaintiff in this matter. We respectfully request that the Court adjourn for two weeks the deadline for Plaintiff to file a motion for conditional certification of a collective action. Defendants consent to this request. The current deadlines are as follows:

1. Opening motion due on 9/15/2021;
2. Opposition due on 10/13/2021; and
3. Reply due on 10/20/2021.

The new deadlines would be:

1. **Opening motion due on 9/29/2021;**
2. **Opposition due on 10/27/2021; and**
3. **Reply due on 11/3/2021.**



The reason for the request is that the parties had to take a break from negotiations due to my 73 year old father being hospitalized with COVID. My father was only discharged today, and his health situation coupled with the Jewish holidays prevented me from devoting sufficient time to this case. We therefore respectfully request that the Court adjourn the deadlines as requested above.

Thank you for your attention to the above.

Respectfully Submitted,

-----/s/-----

Michael Taubenfeld